

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

CLIFFS MINING COMPANY,	)	
	)	Case No. 2:21-CV-968
Plaintiff,	)	
	)	
v.	)	
	)	
EAST GREENFIELD INVESTORS, LLC, and	)	
LAWRENCE FROMELIUS,	)	
	)	
Defendants.	)	

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
ANSWER TO PLAINTIFF'S COMPLAINT**

NOW COME Defendants, EAST GREENFIELD INVESTORS, LLC and LAWRENCE FROMELIUS, by and through their attorneys, BELLAS & WACHOWSKI, and for their Motion for Extension of Time to File Answer to Plaintiff's Complaint state as follows:

1. On August 16, 2021, Plaintiff filed its Complaint for Declaratory Relief with the U.S. District Court of the Eastern District of Wisconsin.
2. On August 9, 2021, Defendant, EAST GREENFIELD INVESTORS, LLC, filed a Demand for Arbitration against Plaintiff with JAMS Resolution Center.
3. On or about August 20, 2021, Defendants were served with Summons and the Complaint.
4. On or about August 24, 2021, Defendants took measures to pause the Arbitration proceedings.
5. In order to develop Defendants' case, counsel requests an additional 30 days to review the Complaint and file their Answer to Plaintiff's Complaint.
6. Defendants' counsel reached out to Plaintiff's counsel regarding the additional time request and Plaintiff's counsel had no objection to the extension.

7. This Motion is not being brought for purposes of delay and its granting will not prejudice the Plaintiff.

WHEREFORE, Defendants, EAST GREENFIELD INVESTORS, LLC and LAWRENCE FROMELIUS, by and through their attorneys, BELLAS & WACHOWSKI, respectfully request an extension until October 4, 2021, to file their Answer to Plaintiff's Complaint and for any further relief the court deems necessary and just.

Respectfully submitted,

EAST GREENFIELD INVESTORS, LLC,  
And LAWRENCE FROMELIUS,  
Defendants

By: /s/ George S. Bellas  
GEORGE S. BELLAS

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